

Rocky Flats Environmental Technology Site

4-K55-ENV-OPS-FO.10

REVISION 3

RECEIVING, MARKING, AND LABELING ENVIRONMENTAL MATERIALS CONTAINERS

APPROVED BY: *M. C. Broussard* / M. C. Broussard / 12/28/95
 Operations Manager, Print Name Date
 Environmental Operations Management

Steve Luke / S. LUKE / 2.28.95
 Quality Assurance Print Name Date
 Manager,
 Data Management and Reporting Services

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Data Management and Reporting Services
 ERPD Environmental Operations Management
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Industrial Hygiene
 Occupational Safety
 Radiological Health and Engineering

USE CATEGORY 3

ORC review not required

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The following 94-DMR-000798 has been incorporated in this revision.

This procedure supersedes procedure 5-21000-OPS-FO-FO.10, Revision 2.

Periodic review frequency: 3 years from the effective date

Background Information: No Site procedure exists that will fulfill the requirements of this document. Good management practice requires proper methodology for handling and identifying Investigation Derived Material (IDM) containers generated from environmental field activities. The IAG requires a procedural framework for developing, implementing, and monitoring appropriate response actions at the site in accordance with CERCLA, RCRA, and CHWA, implementing regulations of these statutes, including the NCP, and CERCLA, RCRA, and CHWA guidance and policy.

LIST OF EFFECTIVE PAGES

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1. PURPOSE

This procedure provides instruction on handling and identifying Investigation Derived Material (IDM) containers (i.e., drums, crates, or other containers) generated from environmental field activities at the Rocky Flats Environmental Technology Site (Rocky Flats). All IDM containers must be returned to a Rocky Flats Environmental Restoration Program Division (ERP) Environmental Operations Management (EOM) representative at Rocky Flats for disposition.

2. SCOPE

This procedure applies to Rocky Flats employees and subcontractors that perform the following activities:

- Receiving an IDM container
- Selecting a drum color code scheme
- Labeling an IDM drum
- Handling an IDM drum
- Returning IDM drums, crates, or other containers to a Rocky Flats ERP EOM representative

3. RESPONSIBILITIES

3.1 Rocky Flats ERP EOM Personnel

Records transmittals (i.e., Form FO.10A, Waste Stream and Residue Identification and Characterization [WSRIC], Waste Environmental Management System [WEMS] container worksheet).

Assists the subcontractor Project Manager and Rocky Flats Project Manager with the management of drums containing IDM.

Issues, inspects, transfers, and receives drums containing IDM.

Maintains the Rocky Flats ERP EOM database.

Provides guidance on packaging, marking, labeling and movement of IDM containers.

3.2 Rocky Flats Key Custodian

Manages secured area containing white drums.

3.3 Rocky Flats Radiological Control Technician (RCT) or Subcontractor Health and Safety Specialist (HSS)

Conducts radiological screening of IDM containers.

3.4 Rocky Flats WEMS Personnel

Assigns an identification (ID) number to each drum.

3.5 Subcontractor Field Personnel or Rocky Flats Personnel

Verifies that the equipment and supplies necessary to perform this procedure are available.

Labels, marks, fills out, and completes required forms, including the Waste/Residue Travelers (RF 47386).

Reports any damage incurred to a drum as soon as possible to the subcontractor Project Manager, Rocky Flats Project Manager and Rocky Flats ERPD EOM personnel. Types of damage include holes, damage to the lid seal, or any other problem that may compromise drum integrity.

Verifies with the subcontractor Project Manager or Rocky Flats Project Manager that required training and qualifications to perform this procedure are complete.

Receives and inspects drums in accordance with 5-21000-OPS-FO.10, Receiving, Labeling and Handling Environmental Materials Containers.

3.6 Subcontractor Project Manager or Rocky Flats Project Manager

Estimates the number and type of containers required for environmental materials.

Completes required training and qualifications.

Ensures that all personnel, including subcontractors, have received ERPD specific training and are qualified to perform the duties, tasks, and responsibilities described in this procedure.

Manages IDM generated and coordinates IDM generating activities.

Forwards copies of documentation to the ERPD training files.

3.6 Subcontractor Project Manager or Rocky Flats Project Manager (continued)

Ensures compliance with United States Environmental Protection Agency (USEPA), Colorado Department of Public Health and Environment (CDPHE), and Rocky Flats requirements and procedures.

4. LIMITATIONS AND PRECAUTIONS

The types of contamination that may be encountered within potentially contaminated work areas include:

- Low-level radioactive contaminated materials
- Resource Conservation and Recovery Act (RCRA)-regulated hazardous materials
- Mixed (low-level radioactive and RCRA-regulated hazardous) materials
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and/or Toxic Substances Control Act (TSCA)-regulated hazardous materials
- Low-level radioactive and CERCLA and/or TSCA-regulated hazardous materials

5. PREREQUISITES

5.1 Planning and Coordination

Subcontractor Project Manager or Rocky Flats Project Manager

- [1] Verifies that at a minimum, two subcontractor field personnel or Rocky Flats personnel are qualified, trained, and available to perform this procedure.

Subcontractor Field Personnel or Rocky Flats Personnel

- [2] Verifies that the equipment and supplies necessary to perform this procedure are available.

5.2 Materials and Equipment

Obtain the following equipment, if required, for field operations:

5.2.1 Special Tools and Equipment

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] Ensure that the following equipment is available:
- Hydraulic excavator (i.e., front-end loader, forklift) attached with a drum grapppler
 - Truck, roller conveyor equipped with solid rollers, or a drum cart
 - Tools for opening and sealing drums (i.e., bung wrench, socket wrenches, etc.)
 - Pallets
 - Department of Transportation (DOT) approved white, 55-gal drums
 - DOT approved black/white, 55-gal drums
 - DOT approved gray 30-gal or 55-gal drums
 - DOT approved green 55-gal drums

5.2.2 Consumables

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] Ensure that the following equipment is available:
- Drum labels
 - Personal protective equipment (PPE) as specified in the project-specific Health and Safety Plan (HASp)
 - 10-mil plastic round-bottomed liner
 - 5-mil plastic liner
 - Black paint pens
 - Waste/Residue travelers and other required forms
 - Black waterproof ink pen
 - Bound waterproof notebook

5.2.3 Field Preparation

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] Drums shall be lined with appropriate plastic liners in accordance with 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside of the Protected Area, 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside the Protected Area, or 1-C88-WP-1027-NONRAD, Non-Radioactive Waste Packaging.

6. INSTRUCTIONS

6.1 Drum Receiving

NOTE 1 *The types of containers required for the project field work shall be determined by the preliminary hazardous waste determination described in 4-F99-ENV-OPS-FO.23, Management of Soil and Sediment Investigation Derived Materials (IDM) and 1-F20-ER-EMR-EM.001, Environmental Approval Process for Construction/Excavation Activities on or Near Individual Hazardous Substance Sites (IHSSs). This determination shall be conducted prior to the start of field work.*

NOTE 2 *A 5-day advance notice to the Rocky Flats ERPD EOM personnel is necessary for obtaining containers. Requests for containers made with less than 5-days lead time shall be filled on an as-available basis.*

Subcontractor Project Manager or Rocky Flats Project Manager

- [1] Estimate the number and type of containers required to perform a project and give notice to Rocky Flats ERPD EOM personnel prior to the start of the project.

Subcontractor Field Personnel or Rocky Flats Personnel

- [2] Check out containers from Rocky Flats ERPD EOM personnel at the drum storage area by logging container information on the drum inventory form.
- [3] Store empty drums on pallets at the work area.

Both empty and filled drums that remain at the work area should be stored on pallets with no more than four 30-gal or three 55-gal drums per pallet. White drums shall not be stored outside or unattended and must be locked up in a secured area by Rocky Flats Key Custodian.

6.2 Drum Color Codes

Rocky Flats has segregated drums into a color coding scheme for identification to ensure the proper management of waste. As noted in 4-K56-ENV-OPS-FO.08, Monitoring and Containerizing Drilling Fluids and Cuttings, gray, green, black/white or white drums are used for IDM generated during environmental investigation field activities.

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] Fill gray drums with IDM that has been designated as potentially non-radioactive, non-RCRA, and non-TSCA through preliminary hazardous waste determination in accordance with 4-K56-ENV-OPS-FO.08.

Gray drums are 30-gal or 55-gal, DOT approved, open-top (removable top) drums with a plastic liner and a 10-mil plastic round-bottomed liner. Gray, 30-gal DOT approved drums will include two 5-mil plastic drum liners.

- [2] Fill white drums with IDM that has been designated as potentially low-level radioactive or mixed (low-level radioactive and RCRA-regulated) soil and sediment IDM through preliminary hazardous waste determination in accordance with 4-K56-ENV-OPS-FO.08, 4-C77-WO-1101, or 4-D99-WO-1100.

White drums are 55-gal, DOT approved, open-top (removable top) drums. White, 55-gal DOT approved drums, include a fiberboard liner and two 10-mil plastic liners in accordance with Item Description Code (IDC).

- [3] Fill green drums with IDM that has been designated as potentially non-radioactive, non-RCRA, and non-TSCA environmental liquids through preliminary hazardous waste determination in accordance with 4-K56-ENV-OPS-FO.08 or 1-C88-WP-1027-NONRAD.

Green drums are 55-gal, DOT approved, bung-top drums.

6.2 Drum Color Codes (continued)

- [4] Fill black/white drums with IDM that has been designated as potentially non-radioactive, RCRA and/or TSCA soil and sediment IDM, through preliminary hazardous waste determination in accordance with 4-K56-ENV-OPS-FO.08 or 1-C88-WP-1027-NONRAD.

Black/white drums are 55-gal, DOT approved, open-top (removable top) drums with a liner, depending on the waste form code (WFC).

6.3 Drum Marking and Labeling

Each drum will be uniquely marked and labeled to ensure proper handling and tracking.

Rocky Flats WEMS Personnel

- [1] Assign an ID number to each drum.

The drum ID number is assigned in a bar-code format.

Subcontractor Field Personnel or Rocky Flats Personnel

- [2] Ensure that all identifying markings are legible, approximately 1 in. high, and written on two (opposite) sides and on top of the container.
- [3] Mark a two-letter subcontractor ID directly after the drum ID number with a black paint pen.
- [A] The letter ID will be assigned by Rocky Flats WEMS personnel and will be marked on each drum (e.g., "EO1326999901589WC" would identify Drum Number EO1326, handled by Woodward-Clyde).
- E01326 - Drum Number
 - 9999 - Prefix
 - 01589 - Extended Number
 - WC - Subcontractor ID

A two-letter ID is obtained from 5-21000-OPS-FO.14, Field Data Management.

- [4] Place information to the right of the stenciled area indicated in Appendix 1, on two (opposite) sides and on the top of the container.

6.3 Drum Marking and Labeling (continued)

NOTE *An example of the gray drum marking format is shown in Appendix 1.*

The following marking and labeling procedures described below apply to any containers used to contain IDM:

NOTE 1 *Drill cuttings from drilling activities shall be placed in drums designated by the drilled interval and the depth interval. The drilled interval represents the top and bottom footage of material contained in a specific drum. The depth interval for drums shall be from the top of the drilled interval to the bottom of the drilled interval. Analytical samples within the drilled interval shall be used, in part, for the drum characterization process described in 4-H46-ENV-OPS-FO.29, Disposition of Soil and Sediment IDM.*

NOTE 2 *The use of a black paint pen to apply identifying marks on IDM containers shall ensure that the markings will not be washed away during decontamination or precipitation. To prevent contamination of samples, paint should not be applied in the vicinity of sampling or field monitoring activities.*

- [5] Mark the location code (i.e., borehole, trench, etc.), project location (e.g., Operable Unit Number), drum fill date (when first material is put in the drum), and drilled interval in feet (rounded to nearest foot) on soil and sediment IDM containers.
- [6] Mark liquid containers with the words "NONPOTABLE PENDING ANALYSIS" in addition to the identification number above the marked drum number.
- [7] Print the drum contents (e.g., soil) with a black paint pen below the drum label on each drum.
- [8] Print the words "FREE LIQUIDS" or "NO FREE LIQUIDS" with a black paint pen above each drum label on each drum.

Free liquids are defined as "liquids that readily separate from the solid portion of a waste under ambient temperature and pressure."

- [9] **IF** questions arise concerning determination of free liquids,
THEN consult Rocky Flats ERPD EOM personnel for guidance.

6.3 Drum Marking and Labeling (continued)

[10] Manage containers that have been designated as potentially “radioactive” through the preliminary hazardous waste determination in accordance with 4-F99-ENV-OPS-FO.23, and label with a “Radiological On-Site Shipping” label.

[A] The subcontractor Project Manager or Rocky Flats Project Manager will consult the Waste Requirements Procedures (WRP) and Rocky Flats ERPD EOM personnel for guidance on packaging, marking and labeling containers that have been given a “radioactive” preliminary hazardous waste determination.

[11] Manage containers that have been designated as potentially “mixed” (RCRA-regulated hazardous and low-level radioactive) or low-level radioactive CERCLA/TSCA” (CERCLA and/or TSCA-regulated hazardous and low-level radioactive) through the preliminary hazardous waste determination in accordance with 4-F99-ENV-OPS-FO.23, the WRP and the On-Site Transportation Manual requirements and label with an “On-Site Hazardous Waste” and “Radioactive On-Site Shipping” labels.

[A] The subcontractor Project Manager or Rocky Flats Project Manager will consult the WRP and with Rocky Flats ERPD EOM personnel for guidance on packaging, marking and labeling containers that have been given a “mixed” or “low-level radioactive CERCLA/TSCA” preliminary hazardous waste determination.

NOTE *Gray IDM drums may have an “On-Site Hazardous Waste Label” in accordance with Rocky Flats Policy, 6-10, and 1-C88-WP-1027-NONRAD.*

[12] Manage containers that have been designated as potentially “hazardous” (RCRA hazardous and/or CERCLA and/or TSCA hazardous) through the preliminary hazardous waste determination in accordance with 4-F99-ENV-OPS-FO.23, and label with an “On-Site Hazardous Waste” label.

[A] Place an “On-Site Hazardous Waste” label on these containers under the bolt assembly 90° counterclockwise from the seam on 6-in. vinyl tape.

[B] Contact Rocky Flats ERPD EOM personnel for movement and management of the drum.

NOTE *An example of an Rocky Flats ERPD EOM label is shown in Appendix 2.*

Rocky Flats ERPD EOM Personnel

[13] Place a Rocky Flats ERPD EOM label on the top third of all drums.

6.4 Drum Handling

NOTE *All IDM containers shall meet DOT specifications for containers, marking, and labeling.*

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] Fill containers in accordance with 4-K56-ENV-OPS-FO.08.
- [2] Manage the IDM in accordance with 4-F99-ENV-OPS-FO.23.
- [3] Evaluate disposition of containers in accordance with 4-H46-ENV-OPS-FO.29.
- [4] Document appropriate information on the Drum Log Form (FO.10A) shown in Appendix 3; Soil and Sediment IDM Form (FO.23A), and the Waste/Residue Traveler (RF 47386). See Appendix 3.
- [5] Independently verify information provided on FO.10A for accuracy and completeness by comparing it against the Drum Field Log QA/QC Form. See Appendix 4.

WARNING

Drums filled with contents that have been designed as potentially "hazardous," including hazardous and radioactive, through the preliminary hazardous waste determinations should not be stored overnight at a borehole location. These drums must be transferred to the custody of Rocky Flats ERPD EOM personnel on the day filled in accordance with 4-K55-ENV-OPS-FO-10. Improper handling of the drums can result in potential noncompliance with state and federal regulations and/or contamination of personnel, equipment, and surrounding areas, if they come from a RCA or Radioactive Materials Management Area (RMMA).

6.4 Drum Handling (continued)

[6] Arrange with Rocky Flats ERPD EOM personnel to immediately transfer filled drums.

[A] Contact Rocky Flats ERPD EOM personnel or their representative to move drums on pallets (drums must be secured) inside trucks with enclosed sides to the transfer/storage area.

Rocky Flats Radiological Engineering or Subcontractor HSS

[B] Conduct a radiation screening on the exterior of the drum before the drum leaves a radiologically controlled area (RCA) or RMMA in accordance with 5-21000-OPS-FO.16, Field Radiological Measurements, and 3-21000-OPS-EMRG, Environmental Management Radiological Guidelines.

NOTE *Drums shall be surveyed for radiation before they are moved.*

Subcontractor Field Personnel or Rocky Flats Personnel

[7] Transmit the original completed Drum Log Form (FO.10A), Drum Field Log Form (QA/QC), and Waste/Residue Traveler (RF 47386) to Rocky Flats ERPD EOM personnel within 3 days when drum custody is transferred.

[A] A copy of each of these forms will be retained by the subcontractor Project Manager or Rocky Flats Project Manager.

6.5 Documentation

Subcontractor or Field Personnel or Rocky Flats Personnel

[1] Provide the original copies of the completed Drum Log Form (FO.10A) to Rocky Flats ERPD EOM personnel within two days of transferring drums.

Rocky Flats ERPD EOM Personnel will send the original Drum Log Form (FO.10A) to the ERPD Records Center and one copy to the Rocky Flats Database Systems (RFEDS).

[2] Rocky Flats ERPD EOM personnel will retain the original Drum Log Forms, and the subcontractor will retain a signed copy of each form in the project files.

6.6 Drum Field Log Form

Retain the Drum Field Log Forms (FO.10A) and Drum Field Log QA/AC Forms (FO.10B) for each drum from the time the drum is issued until it is returned to Rocky Flats ERPD EOM personnel.

Subcontractor Field Personnel or Rocky Flats Personnel

- [1] IF drum composite samples are collected,
THEN circle composite on Form FO.10A and Form 10B.
- [2] IF drum composite samples are not collected,
THEN circle non-composite on Form FO.10A and Form 10B.

Rocky Flats ERPD EOM Personnel

NOTE *In addition to the drum labeling, the Drum Log Forms shall identify the drum location code (i.e., borehole number, trench number, etc.), drum depth interval, OU numbers, and associated sample numbers of the material contained in the drum. The drum log forms shall be used to track the movement of environmental materials generated during environmental field operations.*

- [3] Check and correct Form FO.10A and FO.10B, if necessary, when drum custody is transferred from the subcontractor.

6.7 Computer Database

A database must be used to track drum information. This activity will allow the immediate tracking of any environmental drum used by a subcontractor during environmental field operations and will provide a backup to the field log forms.

Subcontractor Field Personnel or Rocky Flats Project Personnel

- [1] Maintain a simple structured database to produce ASCII files (i.e., LOTUS or EXCEL spreadsheets; dBASE IV; etc.) that clearly relate the following parameters:
 - IDM drum identification numbers
 - Drum fill date
 - Location code (i.e., source location of the IDM)
 - Drilled interval (ground surface to bottom of drum interval)
 - Project name
 - Associated analytical chemistry sample identification numbers for entire depth interval (including radiation screens) of the IDM that is in the drum

6.7 Computer Database (continued)

- [2] Transcribe drum information from Forms FO.10A to digital data files.
- [3] Maintain the resulting digital information.
- [4] After the project is completed, the drum digital information in IBM compatible format will be submitted on 3-1/2" floppy discs to the subcontractor Project Manager or Rocky Flats Project Manager with annotation in the digital file and on the outer disc label to indicate the nature of the data (i.e., correlation of IDM drums to analytical chemistry samples).

7. RECORDS

Management of all records is consistent with 1-77000-RM-001, Records Management Guidance for Records Sources.

ERPD RECORDS SOURCE

- [1] Ensure that the original and one copy of the following quality-related records, as appropriate, are transmitted to the ERPD Project File Center in accordance with 2-G18-ER-ADM-17.01, Record Capture and Transmittal:
 - Form FO.10A
 - Form FO.10B

Submission of record copies to the ERPD Project File Center satisfies Administrative Records Requirements, as defined in 3-2100-ADM-17.02, Administrative Records Screening and Processing.

8. REFERENCES

EPA/540/P-87/001, A Compendium of Superfund Field Operations Methods

EPA/NIOSH/OSHA, Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities

8. REFERENCES (continued)

Hall, Ridgway M. Jr., Tom Watson, Jeffrey J. Davidson, David R. Case,
Nancy S. Bryson, RCRA Hazardous Wastes Handbook

Policy 6-10, Rocky Flats Policy Manual

Waste Requirements Procedures

Waste Stream and Residue Identification and Characterization

Waste Environmental Management Systems

1-C88-WP-1027-NONRAD, Nonradioactive Waste Packaging

1-F20-ER-EMR-EM.001, Environmental Approval Process for
Construction/Excavation Activities on or Near Individual Hazardous Sites (IHSSs)

1-77000-RM-001, Records Management Guidance for Records Sources

1-94700-Traffic-110, On Site Transportation Manual

2-G18-ER-ADM-17.01, Records Capture and Transmittal

3-21000-ADM-17.02, Administrative Records Screening and Processing

3-21000-OPS-EMRG, Environmental Management Radiological Guidelines

4-C77-WO-1101, Solid Radioactive Waste Packaging Outside of the Protected Area

4-D99-WO-1100, Solid Radioactive Waste Packaging Inside of the Protected Area

4-F99-ENV-OPS-FO.23, Management of Soil and Sediment Investigation Derived
Materials (IDM)

4-H46-ENV-OPS-FO.29, Disposition of Soil and Sediment IDM

8. **REFERENCES (continued)**

4-K56-ENV-OPS-FO.08, Monitoring and Containerizing Drilling Fluids and Cuttings

5-21000-OPS-FO.14, Field Data Management

5-21000-OPS-FO.16, Field Radiological Measurements

APPENDIX 1

Page 1 of 1

GRAY DRUM MARKING AND LABELING EXAMPLE

30-Gallon or 55-Gallon Drum

NO FREE LIQUIDS

DRUM ID. E01326WC

ENVIR MAT.

WELL NO. 12991

DATE FILLED 2/1/92

LOCATION OU5

DRILLED INTERVAL 5 - 10 FEET

SOIL

- NOTE:
1. Drum must be labeled on top and two sides.
 2. *Italicized text* must be completed by the subcontractor using a paint pen (test on this figure is only an example).
 3. **Bold text** must be stenciled by the subcontractor.

APPENDIX 2
Page 1 of 1

ERPD EM LABEL

**ENVIRONMENTAL
MONITORING**

CONTACT PERSON:
ED KEIL
X 5892 Pager 4405

Contact 'EM Before Opening

Page 1 of 1

FORM FO.10A (REV. 4)


WEMS Number With Subcontractor ID
Subcontractor Name
Location Code (Well Number)
Project Name / Operable Unit
Drum Contents
Sample (circle one)
Drum Size
Drum Fill Date

OU# _____

Composite / Non-Composite

[illegible]

Comments:



A large, stylized outline of the letter 'E' is positioned over the lined area for comments.

Completed By: _____ Date: _____

Print Name	Signature	Employee # or SS
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Drum Received By: _____ Date: _____
Print Name Signature Employee # or SS

Page 1 of 1

FORM FO.10B (REV. 1)

WEMS Number With Subcontractor ID
Subcontractor Name
Location Code (Well Number)
Project Name / Operable Unit
Drum Contents
Sample (circle one)
Drum Size
Drum Fill Date

_____ OU# _____

_____ Composite / Non-Composite _____

[illegible]

Comments: _____

Completed By: _____ Date: _____

Print Name	Signature	Employee # or SS
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Drum Received By: _____ Date: _____

Print Name Signature Employee # or SS

Datacap: Entered By _____ Checked By _____